

REMARKS/ARGUMENTS

We have amended all independent claims (i.e., claims 1, 9, 20, 33, 39, 48, and 59) to broaden the limitation relating to generating the sequence of codewords from the sequence of values. We have also added new claims 65-71, each of which depends from a corresponding different one of the independent claims. Finally, we have also amended various other dependent claims in non-substantive ways to improve their form.

The examiner rejected claims 1-64 under 35 U.S.C. §103(a) as obvious over Cottrell (U.S. 5,465,084).

With regard to claim 1, the examiner admits that Cottrell does not teach “error-correcting” in the sense of the claim but argues that “it is well known in the art to have a [sic] ‘error-correcting’ situation in computer entry for the motivation of permitting ease of entry of data (by permitting a reasonable amount of error in entry).” The examiner also appears to believe that Cottrell teaches (1) generating a sequence of codewords for a sequence of values; (2) calculating a security value of a security parameter from a sequence of codewords; and (3) comparing the security value to a threshold. And in support of his assertion that Cottrell teaches those concepts, the examiner points to column 2, lines 10-45 and figures 4-5.

We do not believe, however, that the examiner has identified a sufficient basis for rejecting the claims as obvious.

With regard to the error-correcting code, we submit that it is inappropriate for the examiner to simply assert without any documentary support whatsoever that it is obvious to use of an error correcting code to generate a sequence of codewords from a sequence of values that are derived from a sequence of discrete graphical choices. Though error-correcting codes might be well known that by itself does not establish that their use in this context would be obvious. The examiner needs to identify some prior art which suggests employing error-correcting codes in the manner recited in the present claims.

In addition, contrary to what the examiner has argued, we could find no teaching in Cottrell of the three concepts mentioned above. The passages identified by the examiner make no mention of codewords, security parameters, or applying threshold to security parameters. Indeed, none of those concepts even seem to be relevant to the very simple system that Cottrell describes. Cottrell's system employs a password that is nothing more than a "preselected two or three dimensional pattern of elements represented by symbols and/or colors, each of which can be presented by a unique computer code." (Col. 2, lines 56-59). As indicated in the present specification, one form of the security parameter is a measure of the chance of guessing the secret pattern in one guess. There is nothing in Cottrell that even relates to security parameters of that type or any other type.

Claim 9, like claim 1, also recites using a plurality of codewords that are associated with an error-correcting code. Again the examiner simply asserts that using the error-correcting code is obvious. For the reasons stated above, we again submit that the examiner has not provided sufficient support for such a rejection.

Claim 9 also recites "calculating an offset between each value in the sequence of values and the corresponding codeword in the sequence of codewords to generate a sequence of offsets; and hashing the sequence of codewords to produce a hash of the sequence of codewords." The examiner asserts that Cottrell teaches these features and again points to column 2, lines 10-45 and Figs. 4-5 for support. We could, however, find nothing in those cited passages or in those figures or anywhere else in the Cottrell reference which even hints at calculating offsets or hashing the sequence of codewords.

Claims 20, 33, 39, 48, and 59 each recites one or more of the features that are found in claim 1 and 9 and not taught or suggested by Cottrell. So, for at least some of the reasons that we present in connection with claims 1 and 9, we submit that those other independent claims are also patentable over the Cottrell reference.

For the reasons stated above, we believe that the claims are allowable and therefore ask the Examiner to allow them to issue.

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Respectfully submitted,



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